

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ERROL RUDMAN and RUDMAN PARTNERS LP, on behalf of themselves and all others similarly situated,

Plaintiffs,

-against-

CHC GROUP LTD., WILLIAM J. AMELIO, JOAN S. HOOPER, REBECCA CAMDEN, WILLIAM E. MACAULAY, JONATHAN LEWS, KENNETH W. MOORE, J.P. MORGAN SECURITIES LLC, BARCLAYS CAPITAL INC., UBS SECURITIES LLC, HSBC SECURITIES (USA) INC., RBC CAPITAL MARKETS, LLC, WELLS FARGO SECURITIES, LLC, BNP PARIBAS SECURITIES CORP., STANDARD BANK PLC, CORMARK SECURITIES (USA) LTD., COWEN AND COMPANY, LLC, RAYMOND JAMES & ASSOCIATES, INC., SIMMONS & COMPANY, INTERNATIONAL, and TUDOR, PICKERING, HOLT & CO. SECURITIES, INC.,

Defendants.

Case No. 15 Civ. 3773 (LAK)

HON. LEWIS A. KAPLAN

ECF Case

Class Action

**NOTICE OF LEAD PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF PROPOSED CLASS ACTION
SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h), and this Court's June 28, 2017 Order Granting Conditional Class Certification, and Providing for Notice (ECF No. 67), and upon the accompanying: (i) Declaration of Ira M. Press in Support of Final Approval of the Proposed Class Action Settlement, Plan of Allocation, Award of Attorneys' Fees and Expenses, and Reimbursement of Litigation Expenses, dated August 28, 2017; (ii) the Memorandum of Law in Support of Lead Plaintiffs' Motion for Final Approval of Proposed Class Action Settlement and Plan of Allocation; (iii) Affidavit of Eric J.

Miller Regarding Compliance with Notice Requirements in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement; and (iv) all other papers and proceedings herein, Lead Plaintiffs Errol Rudman and Rudman Partners L.P. will and do hereby move this Court, before the Honorable Lewis A. Kaplan, on October 2, 2017, at 4:00 p.m. in Courtroom 21B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, or such other location and time as set by the Court, for entry of a Judgment approving the Settlement as fair, reasonable and adequate, and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable. A copy of the [Proposed] Final Judgment, which was previously filed on June 19, 2017 (ECF No. 64-1) in connection with the Motion for Conditional Class Certification, Providing for Notice of Proposed Settlement, and Setting Schedule for Settlement Approval, is attached hereto.

Dated: August 28, 2017

Respectfully submitted,

KIRBY McINERNEY LLP

By: /s/ Ira M. Press
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